

# Exhibit D

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO,	§	
<i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. SA-21-CV-00844-XR
	§	
GREGORY W. ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

**CONSOLIDATED PLAINTIFFS' NOTICE OF INTENT TO TAKE  
ORAL DEPOSITION OF CINDY SIEGEL**

**TO:** Cindy Siegel, by and through John M. Gore, Jones Day, 51 Louisiana Avenue, N.W., Washington, D.C. 20001 and to All Counsel of Record.

**PLEASE TAKE NOTICE** that pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for the Consolidated Plaintiffs will take the oral deposition of Cindy Siegel on February 28, 2023, at 8:30 am (CST) at the offices of Javier N. Maldonado & Associates, P.C., 1415 North Loop W., Suite 600, Houston, TX 77008 (Andromeda Conference Room on the Mezzanine Level). The deposition shall be recorded by stenographic means and may also be recorded by additional audiovisual means, and shall take place before a notary public or other person authorized by law to administer oaths. Plaintiffs reserve the right to utilize any videotaped deposition at trial in lieu of live testimony, or in addition to live testimony, and/or for any purpose permitted under the Federal Rules of Civil Procedure and Federal Rules of Evidence.

The Consolidated Plaintiffs further request that Ms. Siegel produce, at least two days in advance of the deposition, all documents, if any, that she reviewed in preparation for the deposition.

Dated: February 23, 2023

Respectfully submitted,

/s/ Nina Perales

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\* Admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2023, I provided an electronic copy of the foregoing Deposition Notice to counsel of record.

/s/ Nina Perales

Nina Perales